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11 Attorneys for Plaintiff,  
12 SIX4THREE, LLC, a Delaware  
limited liability company  
13

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16

17 SIX4THREE, LLC, a Delaware limited	)	Case No. 3:17-cv-00359-WHA
18 liability company,	)	
19 Plaintiff,	)	DECLARATION OF DAVID S.
20 v.	)	GODKIN IN SUPPORT OF
	)	PLAINTIFF'S REPLY TO
21 FACEBOOK, INC., a Delaware corporation,	)	DEFENDANT'S OPPOSITION TO
and DOES 1 through 50, inclusive	)	PLAINTIFF'S MOTION TO REMAND
22 Defendants.	)	
23	)	Date: February 16, 2017
	)	Time: 8:00AM
	)	Ctrm: 8
	)	Judge: Honorable William H. Alsup

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1  
2 I, David Godkin, declare:

3 1. I am a partner at the law firm of Birnbaum & Godkin LLP and counsel for  
4 Six4Three, LLC (“643”) in the above-captioned action.

5 2. I submit this Declaration in satisfaction of Civil L.R. 7-2 and 7-5.

6 3. A true and correct copy of the operative complaint filed by plaintiff in *National*  
7 *Credit Reporting Ass’n v. Experian Info. Solutions, Inc.*, U.S. Dist. LEXIS 17303 (N.D. Cal. July  
8 21, 2004) is attached as Exhibit 1.

9  
10 4. A true and correct copy of the operative complaint filed by plaintiff in *In re Nat’l*  
11 *Football Leagues Sunday Ticket Antitrust Litig.*, 2016 U.S. Dist. LEXIS 41639 (C.D. Cal. Mar.  
12 28, 2016) is attached as Exhibit 2.

13 5. A true and correct copy of the letter I sent to Facebook’s Counsel on January 10,  
14 2017 summarizing Six4Three’s review of discovery to date and summarizing the basis for its  
15 Motion to Compel production of documents in the custody of key Facebook executives is  
16 attached as Exhibit 3. This document contains selections and characterizations of documents  
17 which Facebook designated “Confidential” pursuant to Section 2 of the Protective Order entered  
18 into in the state court case by Judge Jonathan Karesh of the San Mateo Superior Court on  
19 October 25, 2016.

20  
21 6. A true and correct copy of Bates Stamp FB-00061365 is attached as Exhibit 4.  
22 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
23 Order in the state-court action.  
24  
25  
26  
27  
28

1           7.       A true and correct copy of Bates Stamp FB-00423235 is attached as Exhibit 5.  
2 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
3 Order in the state-court action.

4           8.       A true and correct copy of Bates Stamp FB-00061249 is attached as Exhibit 6.  
5 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
6 Order in the state-court action.

7           9.       A true and correct copy of Bates Stamp FB-00061437 is attached as Exhibit 7.  
8 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
9 Order in the state-court action.

10          10.       A true and correct copy of Bates Stamp FB-00427400 is attached as Exhibit 8.  
11 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
12 Order in the state-court action.

13          11.       A true and correct copy of Bates Stamp FB-00427604 is attached as Exhibit 9.  
14 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
15 Order in the state-court action.

16          12.       A true and correct copy of Bates Stamp FB-00031050 is attached as Exhibit 10.  
17 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
18 Order in the state-court action.

19          13.       A true and correct copy of Bates Stamp FB-00043884 is attached as Exhibit 11.  
20 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
21 Order in the state-court action.

1           14.     A true and correct copy of Bates Stamp FB-00042856 is attached as Exhibit 12.  
2 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
3 Order in the state-court action.

4           15.     A true and correct copy of Bates Stamp FB-00042899 is attached as Exhibit 13.  
5 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
6 Order in the state-court action.

7           16.     A true and correct copy of Bates Stamp FB-00042373 is attached as Exhibit 14.  
8 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
9 Order in the state-court action.

10           17.     A true and correct copy of Bates Stamp FB-00043830 is attached as Exhibit 15.  
11 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
12 Order in the state-court action.

13           18.     A true and correct copy of Bates Stamp FB-00045735 is attached as Exhibit 16.  
14 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
15 Order in the state-court action.

16           19.     A true and correct copy of Bates Stamp FB-00047134 is attached as Exhibit 17.  
17 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
18 Order in the state-court action.

19           20.     A true and correct copy of Bates Stamp FB-00047035 is attached as Exhibit 18.  
20 This document has been designated by Facebook as “Confidential” pursuant to the Protective  
21 Order in the state-court action.

21. A true and correct copy of Bates Stamp FB-00044220 is attached as Exhibit 19.  
This document has been designated by Facebook as “Confidential” pursuant to the Protective  
Order in the state-court action.

I declare the foregoing to be true and correct as of the date listed immediately below.

DATED: February 9, 2017

By: /s/David S. Godkin  
David S. Godkin  
Attorney for Six4Three, LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies, under penalty of perjury under the laws of the State of  
California, that I electronically filed the foregoing document with the Clerk of the Court using  
the CM/ECF system which will send notification of such filing to the following:

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DATED: February 9, 2017

By: /s/David S. Godkin  
David S. Godkin